



November 22, 2021

***VIA EMAIL***

Roers Companies  
c/o: Mr. Shane LaFave  
[shane@roerscompanies.com](mailto:shane@roerscompanies.com)  
110 Cheshire Lane, Suite 120  
Minnetonka, MN 55305

Subject: Review of Site Investigation Report  
Community Within the Corridor – West Block  
3212 W. Center Street, 2727 N. 32nd Street, & 2758 N. 33rd Street, Milwaukee, WI  
BRRTS #: 02-41-587376, FID #: 341333190

Dear Mr. LaFave:

On September 28, 2021, the Wisconsin Department of Natural Resources (DNR) received a Site Investigation Report (SIR), dated September 22, 2021, prepared by K. Singh and Associates, Inc. (K. Singh) for the site identified above. The SIR was submitted with a Technical Assistance Request fee of \$1050 for DNR review and written response. The DNR has reviewed the SIR for regulatory compliance with Wis. Admin. Code ch. NR 716 and has determined that additional actions and information is needed.

Background

The site is made up of three parcels, which total approximately 2.83 acres, and is covered by parking lots and driveways, greenspace areas and six contiguous buildings (i.e., Buildings 4, 5, 6, 7, 8A and 8B) that were constructed in the early 1900s. The site has been used for various industrial purposes, such as manufacturing activities that may have included painting, manufacturing and leather working, over the past 100 years. A *Notification of Hazardous Substance Discharge* was received by the DNR on March 25, 2021, for soil and sub-slab vapor contaminated with chlorinated volatile organic compounds (CVOCs) and/or polychlorinated biphenyls (PCBs). The source of contamination is identified as the former industrial use of the buildings and the associated spills that likely occurred during site use. K. Singh identified potential sources as the paint storage area and paint spray booths formerly located in Buildings 7 and 8A, respectively. Construction began in February 2021 to redevelop the site into an affordable housing and commercial complex that is a part of the Community Within the Corridor project.

Site Investigation (SI) Summary

SI activities to-date have identified the presence of VOCs and PCBs in the soil, groundwater and/or vapor at the site. VOCs, including tetrachloroethylene (PCE) and its breakdown products, and various PCB aroclors have been identified in the soil at concentrations greater than their respective Wis. Admin. Code ch. NR 720 groundwater pathway, non-industrial direct contact and/or industrial direct contact residual contaminant levels (RCLs). Vinyl chloride has been identified in the groundwater above its Wis. Admin. Code ch. NR 140 enforcement standard (ES). 1,4 – Dioxane, PCE and trichloroethane (TCE) have been identified in sub-slab vapors beneath the site

buildings at concentrations greater than their applicable residential and/or small commercial vapor risk screening levels (VRSLs). Naphthalene has been identified in indoor air samples, collected within utility conduits within the buildings and adjacent right-of-way (ROW), at concentrations greater than its residential vapor action level (VAL).

### Review of SIR

The DNR reviewed the SIR for compliance with Wis. Admin. Code ch. NR 716, and has determined that additional actions and/or information are required to complete the SI, as summarized below.

#### I. Source identification

Wis. Admin. Code § NR 716.01 states that the purpose of SI is to provide the information necessary to define the source(s) of contamination. Furthermore, Wis. Admin. Code § NR 716.07(1) requires that the history of the site or facility, including industrial land uses that may have been associated with one or more hazardous substance discharges, be evaluated.

- A. PCB contamination within the soils appears to be widespread in shallow soils beneath the site buildings. Discuss the potential sources and source areas for PCBs at this site. Consider historic site uses that may have used PCBs in their operations.
- B. Discuss the potential sources for the naphthalene that was identified in all four of the of the indoor air samples collected from within utility conduits in the buildings and adjacent ROW. Discuss the presence/absence of naphthalene within the soil and groundwater data that has been collected during SI activities to-date and whether additional sampling is necessary.

#### II. Degree and extent of contamination in all affected media

Wis. Admin. Code § NR 716.11(3)(a) states the purpose of the field investigation is to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.

##### A. Soil investigation

- i. The southern extent of soils contaminated with VOCs near sample location WB-RTS-2 is not defined. Provide justification for the presumed limited extent of the soil contamination observed at WB-RTS-2. More specifically, discuss whether this identified contamination extends into the Center Street ROW. Alternatively, collect a soil sample to the south of WB-RTS-2 to help to define the extent of soil contamination at this location.
- ii. The western extent of soil contaminated with PCE at concentrations greater than its groundwater pathway RCL beneath Building 7 does not appear defined. Provide justification for the presumed limited extent of PCE soil contamination to the west of this identified contamination.
  - a. Provide the lab analytical results of the confirmation samples collected from the hot spot soil excavation that was performed in Building 7 and discuss these in the above-requested justification.

- iii. Soil contaminated with 1,2-dichlorobenzene and 1,4-dichlorobenzene was identified at sample location WB-SS-2, which was collected from beneath the basement of Building 8A where the former boiler was located.
  - a. An underground storage tank (UST) was discovered to the north of Building 8A during SI/redevelopment activities and this UST may have supported the former boiler in Building 8A. In the SIR, K. Singh states that they plan to remove the UST and perform a Tank System Site Assessment (TSSA). To help better define the soil contamination identified at WB-SS-2 and investigate the potential source of 1,2-dichlorobenzene and 1,4-dichlorobenzene within the soil, the TSSA should include soil analysis for these constituents.
  - b. Considering the data from the TSSA and the data presented in the SIR, discuss, and justify, whether additional soil investigation is needed to the north, south and west of WB-SS-2 to help to define this contamination.
- iv. Soil contaminated with PCB aroclor 1248 at concentrations greater than its groundwater pathway RCL was identified at sample location WB-Int-9 in Building 5. There are no other soil sample locations within Building 5. Additionally, PCBs were not analyzed for in the soil sample collected from sample location WB-SS-8, which is the only sample location in nearby Building 6.

As noted above, the extent of shallow soils contaminated with PCBs appears to be widespread beneath buildings on the entire site. No specific point sources for the PCB contamination have been presented.

The extent of soils contaminated with PCBs in Buildings 5 and 6 should be inferred to include the full extent of these buildings. Alternatively, additional soil sampling within Buildings 5 and 6 could be performed to help to define the extent of PCB contamination beneath these buildings. The response to Section I.A. of this letter should be considered during the delineation of the extent and degree of PCB contamination in these buildings.

- v. The western extent of soil contaminated with PCB aroclor 1254 at concentrations greater than its industrial direct contact RCL at sample location WB-RTS-6 is not defined. Collect a soil sample within the landscaped area immediately west of WB-RTS-6 to help define the extent of soil contamination, which may be a direct contact risk.
- vi. Total PCB concentrations in soil must be considered and compared to the applicable soil RCL value. Include an updated soil data table(s) and provide a discussion that considers total PCB concentrations in the soils at the site.

#### B. Groundwater investigation

- i. Additional groundwater investigation is required downgradient of the soil contamination identified in Building 7. The DNR recommends that a Wis. Admin. Code ch. NR 141 compliant monitoring well be installed just to the east of Building 7. Groundwater samples should be analyzed for VOCs.
- ii. Based on the historic site operations, including the saddlery and paint storage and use along with the detection of per- and poly-fluoroalkyl substances (PFAS) in soil, collect

and analyze groundwater samples for PFAS at MW-4, -5 and the additional well requested above.

- iii. To help establish a trend for the observed groundwater contamination at this site, perform a minimum of another round of groundwater sampling at each monitoring well and analyze for VOCs.

#### C. Vapor investigation

- i. Provide additional information regarding the drain tiles that are found throughout the site. Discuss the purpose of the drain tiles, where they originate, terminate, and the depth at which they are found. Discuss whether the drain tiles are connected to any sumps inside the building. If so, collect water samples from these sumps. Provide a map showing the location of the drain tiles and any sumps located throughout the site.
  - a. If sumps exist within the site buildings, evaluate whether the sumps may be acting as potential conduits for vapor to enter the interior of the buildings. Perform vapor assessments as may be necessary.
- ii. Provide a map highlighting all the existing historic sewer laterals, where they are connected to the sewer main and the flow direction of the main utility lines.
- iii. As detailed in *Additional Subslab Vapor Sampling and Proposed Modification of Remedial Action Plan /Vapor Mitigation System* submitted to the DNR on September 14, 2021, K. Singh proposes to install a vapor mitigation system (VMS) that will operate across the entire building footprint, excluding the basement areas. In the SIR, K. Singh proposes a third round of sub-slab vapor sampling from basement sample locations WB-SS-2 and WB-SS-8 in the winter of 2021/2022.

Considering the proposed VMS layout excludes the basement areas, perform a third round of sub-slab vapor sampling from each basement sample location throughout the entire site to help determine if mitigation of these basement areas is necessary. This additional sampling should be performed after the heating, ventilation and air conditioning (HVAC) systems are fully operational.

- iv. An indoor air sampling program will be required following the installation of the VMS and after the interior construction is completed and HVAC systems are operational. Indoor air samples must also be collected from the basements throughout the site buildings.

Please be aware that the SI can be an iterative process and that data results may indicate further assessment is needed to define the degree and extent of contamination.

### Next Steps

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.14, submit all sampling results within 10 days (on appropriately formatted tables) of receiving laboratory data.
- Per Wis. Admin. Code § NR 716.09, submit an SI work plan within 60 days of the date of this letter in response to the comments provided in this letter. Submit the applicable review fee if you would like to request DNR review of and response to the SI work plan.
- Per Wis. Admin. Code § NR 716.15(1), submit a Supplemental SIR within 60 days after completing the additional SI activities related to the above comments. Submit the applicable review fee if you would like to request DNR review of and response to the Supplemental SIR.
- Per Wis. Admin. Code § NR 724.11, submit a commissioning plan that includes an indoor air sampling plan to demonstrate that vapor action levels are not exceeded in the indoor air, per Wis. Admin. Code § NR 726.05(4). You may reference RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, for commissioning guidelines. Submit the applicable review fee if you would like to request DNR review of and response to the commissioning plan

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me at (414) 435-8021, or by email at [jane.pfeiffer@wisconsin.gov](mailto:jane.pfeiffer@wisconsin.gov).

Sincerely,



Jane K. Pfeiffer  
Project Manager – Hydrogeologist  
Remediation & Redevelopment Program

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